

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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RIGOBERTO VASQUEZ and EVA GARCIA on behalf of:  
themselves and all others similarly situated, :  
Plaintiffs,  
-against-

HONG KONG AND SHANGHAI BANKING:  
CORPORATION LTD., a foreign company; HSBC BANK:  
USA, N.A., a national banking association; and DOES 1:  
through 100, inclusive,

Defendants.

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**NOTICE OF DEFENDANT THE HONGKONG AND SHANGHAI BANKING  
CORPORATION LIMITED'S RENEWED MOTION TO DISMISS FIRST AMENDED  
COMPLAINT PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 12(b)(2)**

**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law, the accompanying Declaration of Yiu Susan Yuen Shan, the accompanying Declaration of George Rajah, the accompanying Declaration of Carol M. Calabrese, and the accompanying Declaration of Gregory S. Korman and exhibits annexed thereto, defendant The Hongkong and Shanghai Banking Corporation Limited (“HSBC Hong Kong”), by and through its undersigned counsel, hereby moves this Court before the Honorable Paul A. Engelmayer, United States District Judge for the Southern District of New York, 40 Foley Square, New York, New York, 10007, for an order, pursuant to Federal Rule of Civil Procedure 12(b)(2), dismissing, with prejudice, the First Amended Complaint against HSBC Hong Kong for lack of personal jurisdiction.

Respectfully submitted,

Dated: New York, New York  
November 8, 2019

**KATTEN MUCHIN ROSENMAN LLP**

By: /s/ Gregory S. Korman  
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